

Comments\_WETA\_BART\_Rule\_20Mar2006

From: Allen & Associates [allenassociates@qwest.net]  
Sent: Monday, March 20, 2006 2:30 PM  
To: Jeffrey, Robert  
Subject: Comments on BART Rule

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From: Don Allen  
To: Bob Jeffrey  
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At the last Stakeholders meeting, you asked that we send in comments on topics discussed at the meeting. Two potential issues that have been raised which would expand BART requirements beyond what is required to comply with the federal program are very troubling. Those issues, if incorporated into the Montana BART rule, would result in the BART rule being used to impose requirements that were not intended to be dealt with in the federal BART program.

On behalf of WETA's members, I strongly urge the Department to not proceed with consideration of using the Potential to Emit (PTE) emissions in modeling, but to follow the intent of the federal law which specified the use of actual emissions with the BART program.

Secondly, we also oppose any attempt to expand the BART rule to apply to non-mandatory federal Class I areas. Again, this expansion would go beyond what Congress specified in the federal law and would promote the use of a BART rule to impose requirements outside the scope of this law.

Montana's existing environmental laws and regulations already provide avenues to address any issues that need to be addressed and a proposed rule designed to address one specific aspect of air quality should not be hijacked to serve another purpose.

Therefore, I am writing to concur in the comments submitted by Hal Robbins, Bison Engineering, Inc. in his March 15, 2006 letter to the Department.

If you have any questions, please give me a call.

Don